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Plumas San Benito Shasta Sierra Siskiyou
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June 13, 2011

Delta Stewardship Council
980 9th Street, Suite 1500
Sacramento, CA 95814

Re: Ag-Urban Alternate Delta Plan

Dear Chairman Isenberg and Members of the Council:

On behalf of the thirty member counties of the Regional Council of Rural Counties (RCRC), I am writing to urge that the Delta Stewardship Council (Council) include for consideration and further analysis in the Delta Plan Environmental Impact Report (EIR), in its entirety, the Alternate Delta Plan recently submitted to the Council by the Ag-Urban Coalition (Coalition).

RCRC has submitted comments on drafts one through three of the Delta Plan separately, as well as joining as a signatory on two coalition letters. As you know, RCRC has been highly critical of the direction taken by the Council staff in the development of the Delta Plan. Some of the key issues of concern with the third staff draft of the Delta Plan include: it contains no plan to meet the co-equal goals; it would have the Council acting as a regulatory agency in a manner that exceeds the authority provided to the Council in the Delta Reform Act; the geographic scope of the Delta Plan which extends well beyond the Delta itself; the assertion of jurisdiction over state and local agencies; the absence of recognition of the protections contained in the Delta Reform Act relating to area of origin water rights, etc.; and, recommendations relating to financing that include the recommendation that the Legislature grant to the Council the authority to develop fees to fund the operational costs of the Council, among other entities.

RCRC has reviewed the Alternate Delta Plan and believes that it deserves full consideration and discussion by the Council. Among its merits, the Alternate Delta Plan not only contains a comprehensive "plan", it also establishes a collaborative approach utilizing the authority of the cooperating agencies as the enforcement mechanism, as intended by the Delta Reform Act. This is in contrast to the Council third staff draft which contains no plan and in which the Council itself seeks to assert regulatory powers beyond those conferred by statute.

In conclusion, RCRC requests your serious consideration of our request that the Alternate Delta Plan, in its entirety, be included as a project alternative in the draft EIR for the Delta Plan. Please contact me at (916) 447-4806 or kmannion@rcrcnet.org if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Mannion". The signature is fluid and cursive, with the first name "Kathy" being more prominent than the last name "Mannion".

Kathy Mannion
Legislative Advocate

cc: Mr. Joseph Grindstaff